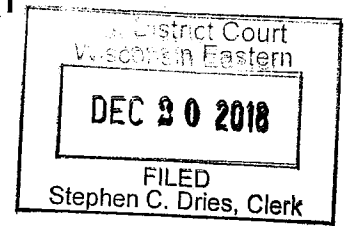


# UNITED STATES DISTRICT COURT

## EASTERN DISTRICT OF WISCONSIN



UNITED STATES OF AMERICA

v.

### CRIMINAL COMPLAINT

CASE NUMBER: 18-M- 767

Alexander P. Bebris  
(DOB: [REDACTED] 969)

I, Brian J. Hammen, the undersigned complainant, being duly sworn, states the following is true and correct to the best of my knowledge and belief. That on or about December 19, 2018, in the State and Eastern District of Wisconsin, Alexander P. Bebris, did commit a violation of Title 18, United States Code, Section 2252A(a)(5)(B) "possession of child pornography;" and on or about September 7, 2018, in the State and Eastern District of Wisconsin, Alexander P. Bebris, did commit a violation of Title 18, United States Code, Section 2252A(a)(2)(A) "distribution of child pornography."

I further state that I am a Detective with the Winnebago County Sheriff's Office, and this complaint is based on the following facts:

Please see the attached affidavit.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

  
Signature of Complainant  
Brian J. Hammen

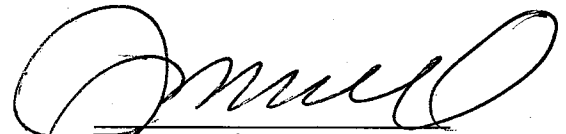
Sworn to before me and subscribed in my presence,

December 20, 2018  
Date

at Green Bay, Wisconsin  
City and State

The Honorable James R. Sickel  
United States Magistrate Judge

Name & Title of Judicial Officer

  
Signature of Judicial Officer

Your affiant is employed as a detective with the Winnebago County Sheriff's Office in Oshkosh, Wisconsin. Your affiant is a sworn law enforcement officer with 21 years experience in the State of Wisconsin and has been an internet crimes against children investigator for the past five years. Your affiant has received over 100 hours of specialized training in the investigation of online child exploitation and sensitive crimes. I base the following on my knowledge of the investigation and information that was shared with me by fellow law enforcement and forensic investigators and analysts.

On 12/13/18 at 08:37 hours Megan Paskey of the Wisconsin ICAC Taskforce Division of Criminal Investigation contacted the Winnebago County Sheriff's Office requesting to investigate two related CyberTips. DCI Paskey referred CyberTip 39932621 and 40017882 to Investigator Michael Sewall W203 of the Winnebago County Sheriff's Office and myself. Investigator Sewall and I received the CyberTip information from the ICAC Data System. The ICAC Data System ("IDS") also sent an email notification regarding these CyberTips.

The CyberTips were submitted to the National Center for Missing and Exploited Children ("NCMEC") by Facebook located at 1601 Willow Road, Menlo Park, CA 94025 and both tips were identified as a child pornography (possession, manufacture, and distribution) incident. CyberTip 39932621 was reported to occur on 09/06/2018 at 13:25:46 hours UTC. Facebook reported the user to be Alexander Bebris, date of birth [REDACTED] 1969 with an email address of [abebris@gmx.com](mailto:abebris@gmx.com) and a screen/user name of alexander.bebris.s. Facebook identified two images suspected to be child pornography. Upon reviewing both images uploaded they are the same image. The image file name is dfmt8iwfnrwwggcc41237115\_278342916107433\_9187536822601777152\_o.jpg. Investigator Sewall and I reviewed the file dfmt8iwfnrwwggcc41237115\_278342916107433\_9187536822601777152\_o.jpg and describe it as follows:

The image depicts a pubescent male approximately 12 to 15 years old sitting on the ground. The pubescent male is sitting in grass against a black fence. The pubescent male is naked and has both hands holding the sides of his erect penis. The focus of the image is on the pubescent male's genitals.

As part of this investigation, Wisconsin Department of Justice Division of Criminal Investigation

Program Policy Analyst Paskey requested an Administrative Subpoena be issued to Charter Communications regarding records related to IP address 174.97.163.58 which is the login IP for the uploaded files. On 12/07/18 an Administrative Subpoena was issued for the aforementioned account. On 12/12/18 Charter Communications provided the requested records to DCI PPA Paskey, which indicated the subscriber name as Alexander Bebris at 1732 Dublin Trail, Apt. 37, Neenah, WI 54956, which is located in the state and Eastern District of Wisconsin.

CyberTip 40017882 was reported to have occurred on 09/09/2018 at 17:04:49 UTC. Facebook reported the user to be Alexander Paul, date of birth [REDACTED]-69, mobile telephone number 19374147733, with the email address [apb937@gmail.com](mailto:apb937@gmail.com). Facebook identified one image suspected to be child pornography. The image file name is 37xt9psvnwg0g4wk41406787\_328785991020877\_8238839896228233216\_n.jpg. Investigator Sewall and I reviewed the file 37xt9psvnwg0g4wk41406787\_328785991020877\_8238839896228233216\_n.jpg and describe it as follows:

The image depicts four naked females standing on what appears to be a beach area. Two of the females' faces are not visible in the image and they are standing next to a prepubescent female approx. 8-10 years old and a pubescent female approx. 13-15 years old which their faces are shown. All the females have their breast and vaginas exposed.

As part of this investigation, Wisconsin Department of Justice Division of Criminal Investigation Program Policy Analyst Paskey requested an Administrative Subpoena be issued to Charter Communications regarding records related to IP address 2605:a000:1508:825f:285e:b049:d065:4fb3 which is the login IP for uploaded files. On 12/07/18 an Administrative Subpoena was issued for the aforementioned account. On 12/11/18 Charter Communications provided the requested records to DCI PPA Paskey, which indicated the subscriber name as Alexander Bebris at 1732 Dublin TRL, APT 37, Neenah, WI 54956.

It is my opinion, based on my training and experience, that the two files that I reviewed and described, depicts child pornography in violation of state and federal law. Above are descriptions of the files provided by Facebook. Investigator Sewall and I use the terms "prepubescent" and "pubescent." Investigator Sewall and I have no formal medical training in the use of those terms but in applying them we rely on our experience as an investigator in child

pornography investigations and our common experience. I use the term "pubescent" to mean a child who has begun to develop and display mature body shape and genital organs and/or secondary sexual characteristics such as, but not limited to, the development of breasts in females and the appearance of pubic hair and underarm hair, typically seen in children between 11-16 years of age. The term "pubescent" indicates in my opinion that the person depicted is a child, but evidences some physical and sexual maturation consistent generally with a young teenager or teenager. I use the term "prepubescent" to describe a child who does not exhibit any, or only very limited, physical-sexual development such as those indicators mentioned above, such that the child appears to be well under the age of 18 years and likely under the age of 13 years in the case of both males or females.

I checked current WI DOT records and located Alexander P Bebris M/W DOB: [REDACTED]-69 at 1732 Dublin Trail #37, Neenah, WI 54956. Records show the address was updated 09/08/2018.

I can conclude from my training and experience that this investigation concerning the computer or computers identified at the following IP address or IP addresses indicated that the computer or computers contained, and contributed to the distribution of child pornography on the dates and times indicated:

174.97.163.58 on 09/06/2018 at 13:25:46 hours UTC

2605:a000:1508:825f:285e:b049:d065:4fb3 on 09/09/2018 at 17:04:49 UTC

I am also aware that the aforementioned child pornography images were uploaded and distributed from the Facebook accounts linked to Alexander Bebris as detailed above. Specifically, the digital images were distributed via Facebook Messenger to the Facebook account of C.W. who resides outside the State of Wisconsin.

On 12/19/2018 a search warrant was executed at 1732 Dublin Trail #37, Neenah, WI 54956 in Winnebago County. Contact was made with Alexander P Bebris DOB: [REDACTED]-69 who resides at the apartment. Alexander said he lives in the apartment alone. A Dell computer was located within a bedroom in the apartment and seized as an evidentiary item. The hard drive in the Dell computer was examined by a digital forensic analyst from the Division of Criminal Investigation.

The forensic analyst located 89 files of interest on the hard drive related to the investigation of Possession of Child Pornography. Analyst Sewall and I reviewed the images and observed numerous images that meet the state and federal statutory requirements for child pornography. I am providing an estimation of the child's age depicted in the images based on my training and experience as I do not have any formal medical training in estimating ages.

The following is a partial list of the images which include the image name and description of the image.

File Name: pf2fjzxn.bmp

This image depicts a prepubescent female approximately 6 to 8 years old completely nude. The prepubescent female is lying on a brown towel and has her hands and ankles bound by purple restraints over her head. There appears to be adult hands spreading the vagina and anal cavity open. The anal cavity and vagina are the focus of the image.

File Name: zmilipfx.bmp

This images depicts a prepubescent female with an approximate age of 5 to 7 years old completely nude laying on what appears to be a multi-colored blanket. The female has her left arm above her head with her right hand touching an adult erect penis which is inserted into her vagina.

File Name: 400l6ey9.bmp

This image depicts a prepubescent female with an approximate age of 5 to 7 years old completely nude laying on a purple blanket. The female's right hand is raised above her head and her left hand is holding an adult's erect penis. There appears to be ejaculate on her stomach and chest.

File Name: q4f3u40s.bmp

This image depicts a prepubescent female with an approximate age of 5 to 8 years old completely nude. The prepubescent female appears to be lying on a brown chair with her legs spread and raised in the air exposing her genitals and anus. There appears to be ejaculate covering her vagina and anus.

File Name: ljinvxz0e.bmp

This image depicts two prepubescent males approximately 7 to 10 years old both of which are completely nude on a Twister board. One male is on his hands and knees and the other can be seen with his penis inserted into that male's rectum.

File Name: sssvs.png

This image depicts a prepubescent female with an approximate age of 7 to 10 years old wearing only her shoes. The prepubescent female is squatting behind a dog with her vagina exposed. The prepubescent female can be seen holding the dog's erect penis and her mouth wrapped around the dog's penis.

File Name: bfbgr.png

This image depicts a prepubescent female with an approximate age of 5 to 8 years old. The prepubescent female is seated and has her shirt pulled up and blue underwear pulled down to her ankles. The prepubescent female's vagina is exposed and a dog can be seen licking the prepubescent female's vagina.

File Name: klk30anq.bmp

This image depicts a prepubescent female with an approximate age of 8 to 10 years old. The prepubescent female is completely nude sitting on what appears to be a blue chair. The prepubescent female is shackled at her wrists and has her legs spread exposing her genitals. The prepubescent female's genitals are the focus of the image.

File Name: hchb2qif.bmp

This image depicts an infant male with an approximate age of 1 to 2 years old bending over leaning on his hands wearing a yellow shirt and a blue towel. The infant male's anus and genitals are exposed and are the focal point of the image.

File Name: d7p6ks7h.bmp

This image depicts a prepubescent male and female with approximate ages of 6 to 9 years old. Both are completely nude laying on green air mattresses. They are both pulling their ankles towards their head exposing their anuses and genitals.

Brian Hammen

Det. Brian J. Hammen

Winnebago County Sheriff's Office

Subscribed and sworn before me this 20 day  
of December 2018.

James R. Sickel  
The Honorable James R. Sickel  
United States Magistrate Judge